

CalRecycle Responses to Third 15-day Comments, Proposed Regulation on Architectural Paint Recovery Program

Section/ Area	Comment Number	Commenter Affiliation	First Name	Last Name	Summary of Comment	CalRecycle Response	Revisions Needed
General Comment	W46-01	San Francisco Dept. of Environment	Sushma	Bhatia	We support the goals of AB1343 and the latest draft of the paint regulations that require manufacturers to pay for collection, transportation and recycling of architectural paint.	This is a general comment to the proposed regulation and not related to the modifications which were the subject of the 15-day comment period.	None
Unidentified by commenter	W46-02	San Francisco Dept. of Environment	Sushma	Bhatia	The regulations should explicitly require manufacturers to cover costs of management of paint containers.	No response is needed since this comment is not related to the modifications which were the subject of the 15-day comment period.	None
Unidentified by commenter	W46-03	San Francisco Dept. of Environment	Sushma	Bhatia	While the regulations require paint manufacturers to cover CalRecycle's administrative costs, the regulations do not include local government administrative costs. As you know, local governments incur costs to recruit, train, and oversee collection centers on an ongoing basis. If paint manufacturers choose to contract with local governments to fund existing collection programs, they should be required to cover administrative costs incurred by local governments.	No response is needed since this comment is not related to the modifications which were the subject of the 15-day comment period.	None
Unidentified by commenter	W46-04	San Francisco Dept. of Environment	Sushma	Bhatia	In addition to administrative costs, local governments that operate HHW facilities incur infrastructure maintenance costs, which paint manufacturers should be required to cover. More than 50% of paint collected in our jurisdiction is received directly at the HHWCF. Further, the HHWCF's existing latex paint processing capacity and infrastructure allow for efficient and effective local reuse of approximately 75 percent of all paint collected and recycled in our jurisdiction.	No response is needed since this comment is not related to the modifications which were the subject of the 15-day comment period.	None
Unidentified by commenter	W46-05	San Francisco Dept. of Environment	Sushma	Bhatia	Since the regulations allow paint manufacturers to choose between direct contracts with retail locations and local government contracts, we are concerned that paint manufacturers may choose to contract only with a limited number of retail collection centers in lieu of fully funding local government administered programs to limit costs. In order to avoid the potential for reduction of existing paint drop-off locations and reuse options available to the consumer, we recommend that CalRecycle require paint manufacturers to maintain at least the existing level of paint collection and recycling service currently available in each jurisdiction.	No response is needed since this comment is not related to the modifications which were the subject of the 15-day comment period.	None
Unidentified by commenter	W46-06	San Francisco Dept. of Environment	Sushma	Bhatia	The regulations require manufacturers to submit generation data to the State. This data is very useful to local governments that currently administer programs and expect to continue to do so in partnership with paint manufacturers. We recommend that the paint manufacturers be required to also provide this data to local governments	No response is needed since this comment is not related to the modifications which were the subject of the 15-day comment period.	None